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17 Attorneys for Defendant
18 INTUIT INC.

19
20 UNITED STATES DISTRICT COURT
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22 NORTHERN DISTRICT OF CALIFORNIA
23
24 SAN JOSE DIVISION

25 IN RE: HIGH-TECH EMPLOYEE
26 ANTITRUST LITIGATION

27 Master Docket No. 11-CV-2509-LHK

28 THIS DOCUMENT RELATES TO:
ALL ACTIONS

DECLARATION OF INTUIT'S IN-
HOUSE COUNSEL THOMAS
HENRY

DECLARATION

I, Thomas Henry, declare as follows:

3 1. I am Assistant General Counsel at Intuit, Inc. (“Intuit”) and have held this position
4 since July 2012. I supervise the litigation of the above-referenced matter, assuming the role held
5 by Lisa Borgeson who is no longer with Intuit. I submit this Declaration regarding Intuit’s
6 production of compensation-related materials pursuant to the Court’s April 15, 2013 Case
7 Management Order. This Declaration is based on personal knowledge, information obtained
8 from others, and a review of records.

Data

10 2. After numerous meet and confers, plaintiffs and Intuit agreed to the scope of
11 compensation-related data Intuit would collect and produce. Intuit produced all compensation-
12 related data agreed to by the parties for the discovery period within its possession located after a
13 reasonable search of places likely to have such data, including from four different databases. The
14 data produced included salary, bonus compensation, equity grants, and any available market
15 survey data. Moreover, Intuit answered written questions provided by plaintiffs and produced
16 30(b)(6) witnesses in June 2012 who testified as to the contents and completeness of this data.

Documents

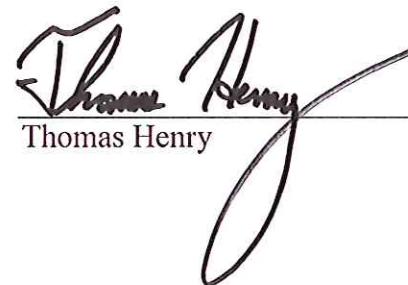
18 3. In addition, Intuit believes that it has produced all responsive compensation-related
19 non-data materials within its possession, custody, or control. Pursuant to an agreement with
20 plaintiffs, Intuit collected certain categories of compensation-related materials without the use of
21 search terms, conducting a reasonable and diligent search of pertinent records. Intuit also located
22 additional responsive compensation-related materials by running agreed-upon search terms
23 against the electronically stored information of agreed-upon custodians. In collecting and
24 reviewing these documents, Intuit produced whatever responsive documents it found from the
25 entire discovery period.

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1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct. Executed this 25th day of April 2013 in Mountain View, California.
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Thomas Henry